

Revised 09/03

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2003 SEP 29 P 2:05

STATE OF COLORADO

00890 RF03

Bill Owens, Governor
Douglas H. Benvenuto, Executive Director

CORRESPONDENCE
CONTROL

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

DUE DATE
ACTION

DIST	LTR	ENC
BERARDINI, J. H.	X	
BOGNAR, E. S.	X	
BROOKS, L.	X	
BUTLER, L.	X	
CROCKETT, G. A.	X	
DECK, C. A.	X	
DEGENHART, K. R.	X	
DIETER, T. J.	X	
DIETERLE, S. E.	X	
FERRERA, D. W.	X	
GIACOMINI, J. J.	X	
HETT, S. B.	X	
ISOM, J. H.	X	
LINDSAY, D. C.	X	
LONG, J. W.	X	
LYLE, J. L.	X	
MARTINEZ, L. A.	X	
NAGEL, R. E.	X	
NORTH, K.	X	
PARKER, A. M.	X	
RODGERS, A. D.	X	
SHELTON, D. C.	X	
SPEARS, M. S.	X	
TRICE, K. D.	X	
TURNER, N. R.	X	
WILLIAMS, J. L.	X	
Zabala, C.	X	

September 23, 2003

Mr. Mark Sattelberg
Senior Contaminant Biologist
US Fish and Wildlife Service
Rocky Mountain Arsenal National Wildlife Refuge
Building 111
Commerce City, CO 80222-1748

Dear Mr. Sattelberg:

The Colorado Department of Public Health and Environment has received your letter dated August 20, 2003 in which you asked the department's position concerning potential activities being considered by the US Fish and Wildlife Service (Service) for use at the future Rocky Flats National Wildlife Refuge. The Department's responses to each potential activity follow:

1 Does CDPHE foresee any restrictions on the use of prescribed fire?

As you know, in June 2003 CDPHE and the Environmental Protection Agency approved modifications to the Rocky Flats Cleanup Agreement, which included substantially revised contaminant soil action levels. The surface soil action level for plutonium was established at a very conservative 50 picocuries per gram of soil. Most surface soil plutonium contamination at Rocky Flats is related to airborne releases of plutonium contamination in the late 1960s that were related to the 903 Pad. The highest concentrations of plutonium contamination in surface soils found to date are at the 903 Pad itself. An accelerated action at the Pad to remove this contaminated soil is nearing completion. Lower levels of plutonium contamination in surface soil are present east of the 903 Pad. Surface soils with levels greater than 50 picocuries per gram will be removed in accordance with RFCA. Surface soils with plutonium levels lower than 50 picocuries per gram will likely be left in place.

The modified RFCA includes a site map that shows an area of land that is anticipated to be retained by DOE after site closure. This area includes the Industrial Area, the Buffer Zone retention ponds, ground water treatment systems, the two existing landfills, and the area of surface plutonium contamination located east of the 903 Pad with contamination levels above approximately 7 picocuries per gram. CDPHE does not believe that the resulting smoke and dust from a prairie fire in the area of surface soil contamination between 7 and 50 picocuries per gram would pose a human health risk. Nonetheless, the department would likely place restrictions on burning in these areas in order to minimize soil disturbance and potentially adversely impact the plutonium surface water standard.

Reviewed for Addressee
Corres. Control RFP

9/29/03
Date By

Ref Ltr #

DOE ORDER #

NONE

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

ADMIN RECORD
SW-A-004839

Current data indicate that most of the land that is anticipated to be turned over to the Service after site cleanup is completed has little or no plutonium contamination, and CDPHE does not anticipate placing restrictions on prescribed burning in these areas. Final delineation of areas of the site with restrictions, including those areas that will be retained by DOE and not transferred to the Service, will be determined after completion of the Comprehensive Risk Assessment (CRA). The CRA will not be completed until 2005 at the earliest. Additional soil sampling will likely be conducted in areas of the Buffer Zone where sampling data are limited.

2. Assuming that the deer tissue results agree with the CSU data, do you foresee any restrictions on the use of grazing as a weed management tool? Do you foresee any restrictions on the consumption of edible tissues from the grazing animals used for weed control at Rocky Flats?


Based on historical animal studies, the actinide migration panel results, and the low levels of residual contamination that will be present at Rocky Flats after cleanup, there is little evidence to indicate that grazing will present a risk to livestock or the consumer. CDPHE would not expect to place restrictions on grazing except to minimize surface soil disturbance in those areas with residual plutonium contamination levels between approximately 7 and 50 picocuries per gram.

3. Do you foresee any restrictions on the plowing or ripping of these types of areas for the purpose of reestablishing native vegetation?

The plowing or ripping of surface soils would likely be prohibited in those areas with contamination between approximately 7 and 50 picocuries per gram. As stated in the answer to question number 1 above, RFCA anticipates that DOE would retain the area of the site with those levels of contamination. Any roadways that cross this area could be disturbed for the purpose of revegetation and road removal, provided that adequate precautions are taken for dust and runoff control, and that any worker safety issues are addressed.

If you have any questions, please contact me at 303-692-3367.

Sincerely,



Steven H. Gunderson
Rocky Flats Project Coordinator

cc Dean Rundle, FWS
Tim Rehder, EPA
Joe Legare, DOE
Dave Shelton, KH
Administrative Records, T130G

